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May 16, 2023

Mitsugi v. Jung, No. 1:22-cv-08025-LGS

Dear Judge Schofield:

Pursuant to the Court's Order dated May 11, 2023 (Dkt. No. 65), Robert Ryuichi Mitsugi ("Petitioner") and Eunji Jung ("Respondent") (together, the "Parties") respectfully submit this joint letter regarding mutually-agreeable experts to serve as an impartial expert to the Court.

The Parties offer the below list of potential experts in Japanese law from which the Court could select a neutral expert.¹ The Parties, their experts (Messrs. Haraguchi and Young), their counsel in Japan, and their counsel in this proceeding before the Court (inclusive of their firms, Cravath, Swaine & Moore LLP and Arnold & Porter), represent that they do not have any relationship with the experts included on this list.² This list is organized alphabetically, by the experts' surnames, along with the Parties' ranking of each expert.

¹ These five experts are those included on the Parties' joint list submitted on March 3, 2023 (Dkt. No. 40). At that stage, the Parties limited the list to those experts both Parties mutually agreed to include. If the Court would like to consider a wider list of possible experts, or if the experts included herein are unwilling or unable to assist in this case, the Parties can of course submit the names of additional potential experts they would propose for the Court's consideration.

² Petitioner confirms that Arnold & Porter and Mr. Haraguchi do not have any relationship with those experts. Petitioner does not believe there are any conflicts from the Petitioner and his Japanese counsel but are awaiting final confirmation. Petitioner will promptly inform the Court if there are any conflicts.

Expert	Position	Petitioner's Rank	Respondent's Rank
Hiroataka Honda	Attorney of Law, Tokyo, Japan, Officer of the Family Law Committee of the International Bar Association	5	1
Atsumi Kubota	Professor of Law at Kobe University, Hyogo, Japan	4	4
Noriko Mizuno	Professor of Law at Hakuoh University, Tochigi, Japan, former chair of the Japan Society for Socio-Legal Studies on Family Issues	1	3
Shuhei Ninomiya	Professor Emeritus of Law at Ritsumeikan University, Kyoto, Japan	2	5
Atsushi Omura	Professor of Law at Gakushuin University, Tokyo, Japan	3	2

Respectfully Submitted,

By: /s/ Imani C. Tisdale

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VIA ECF